

20

PRC Environmental Management, Inc.
650 Minnesota Avenue
Kansas City, KS 66101
913-281-2277
Fax 913-281-5383



July 20, 1993

Mr. Ruben McCullers
Work Assignment Manager
U.S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, KS 66101

**Subject: Review Comments on the Revised Environmental Audit Plan for
Knapheide Mfg. Co., West Quincy, Missouri
Contract No. 68-W9-0006; Work Assignment No. R07068**

Dear Mr. McCullers:

PRC Environmental Management, Inc. (PRC), is submitting review comments on the Revised Environmental Audit Plan for Knapheide Mfg. Co. (Knapheide). The revised plan, dated July 2, was prepared for Knapheide by the McLaren/Hart Environmental Engineering Corporation. The revised plan was submitted in response to the Environmental Protection Agency's (EPA) June 8 comments on the May 7 plan.

PRC reviewed the revised plan to ensure that EPA's comments were adequately addressed and that the revisions made were consistent with the Consent Agreement/Consent Order (CA/CO), dated March 4, 1993.

PRC found that the revised plan addressed most of EPA's comments. Several of EPA's comments, however, were not fully addressed. The modifications necessary to completely address EPA's comments are found in the enclosed comments.

PRC formed its comments as you requested so that they can easily be modified and sent to the facility. If you have any questions or comments, please call me at (913) 281-2277.

Sincerely,

Nathan Meyer
Environmental Scientist

Enclosure (hard copy and disk copy)

cc: Aaron Zimmerman, U.S. EPA-RPO (letter only)
Paula Hirtz, PRC (letter only)



R00000385
RCRA Records Center

**TECHNICAL REVIEW COMMENTS
ON THE
REVISED ENVIRONMENTAL AUDIT PLAN
Knapheide Mfg. Company
West Quincy, Missouri
July 2, 1993**

INTRODUCTION

PRC Environmental Management, Inc. (PRC), reviewed the Revised Environmental Audit Plan for Knapheide Mfg. Co. (Knapheide). The revised plan, dated July 2, was prepared for Knapheide by the McLaren/Hart Environmental Engineering Corporation (McLaren/Hart). The revised plan was submitted in response to the Environmental Protection Agency's (EPA) June 8 comments on the May 7 plan.

PRC reviewed the revised plan to ensure that EPA's June 8 comments were adequately addressed and that the revisions made were consistent with the Consent Agreement/Consent Order (CA/CO), dated March 4, 1993.

GENERAL COMMENTS

The revised plan addressed most of EPA's June 8 comments. Several of EPA's comments, however, were not fully addressed. The modifications necessary to completely address EPA's comments are found under the specific comments.

SPECIFIC COMMENTS

These specific comment numbers reflect those used in EPA's June 8 comments to Knapheide. These comments must be addressed before approval of the environmental audit plan will be granted.

1. Section 4.0, Page 4-1, Records Documentation Review.

This comment was adequately addressed.

2. Section 4.0, Page 4-1, Detailed Facility Inspections.

This comment was adequately addressed.

3. Section 4.0, Pages 4-5 through 4-8, Compliance Status Assessment.

This comment was partially addressed. The revised plan included a facility map and stated that the environmental audit report would provide a history of all areas of environmental concern (AOEC). The revised plan also stated that the audit team will: (1) photograph all AOEC,

(2) indicate all sampling points on a facility map, (3) examine areas around each AOEC for signs of potential releases, and (4) photograph any visible signs of releases.

The revised plan, however, did not state that:

- The audit team must document sample collection procedures, including sample number, location, depth, and method of collection in a bound field logbook.
- The audit team must collect duplicate samples (split samples) at a frequency of at least 10 percent for each media type (e.g., soil, water, air) to assess the precision of the formal analytical laboratory used by the facility.
- The audit team must follow standard sample chain-of-custody procedures.

The revised plan must be corrected to indicate that these activities will be conducted during all sampling activities.

4. Section 4.0, Page 4-5, Wood Treatment Areas.

This comment was adequately addressed.

5. Section 4.0, Pages 4-5, Potential Fuel Spill Area/Former Underground Tank Areas.

This comment was partially addressed. The revised plan indicated that no sampling will occur in these areas during the audit, which is acceptable. However, the revised plan did not append reports of previous investigations as requested. Therefore, EPA requires that the audit team summarize these investigations and include a discussion of them in the environmental audit report.

6. Section 4.0, Pages 4-5 and 4-6, Fire Pond.

This comment was addressed. The revised plan stated that the audit team will evaluate the fire pond for National Pollutant Discharge Elimination System (NPDES) requirements. The revised plan also stated that the purpose of collecting wastewater samples was to identify opportunities for pollution prevention or pollution reduction. Collection of wastewater samples for this purpose is acceptable.

Although EPA's June 8 comments did not specifically request that the audit team determine if the fire pond could be a regulated surface impoundment subject to the regulations of 40 Code of Federal Regulations Part 265, this determination is necessary before supplemental environmental projects in this area can be proposed. Therefore, the revised plan must state that this activity will be conducted during the audit.

In addition, EPA maintains that at least one sediment sample be collected from the fire pond for analysis of volatile organic compounds (Method 8240), semivolatile organic compounds

(Method 8270), and metals (Method 6010/7000). If the fire pond is not a regulated surface impoundment, restoration of the fire pond sediments may be a supplemental environmental project.

7. Section 4.0, Page 4-6, Aboveground Storage Tank Area.

This comment was adequately addressed.

8. Section 4.0, Page 4-7, Stormwater Ditches.

This comment was partially addressed. Table 5 indicates that five composite samples and two grab samples will be collected from the stormwater ditch. If more than one ditch or tributaries to the ditch are identified, the number of samples collected may need to be increased.

9. Section 4.0, Page 4-7, Drum Storage Area.

This comment was adequately addressed.

10. Section 4.0, Page 4-7, Waste Storage Building.

This comment was adequately addressed.

11. Section 4.0, Pages 4-7 and 4-8, Sandblasting and Paint Hook Cleaning Areas.

This comment was adequately addressed.

12. Section 4.0, Pages 4-7 and 4-8, Paint Hook Cleaning Area.

This comment was adequately addressed.

13. Section 4.0, Page 4-8, Air Emission Sources.

This comment was partially addressed. The revised plan stated that the purpose of collecting the air samples is to evaluate opportunities for pollution prevention or pollution reduction. The revised plan, however, did not state that the audit team will determine whether the collection of ambient air samples inside the building is required under the Occupational Safety and Health Act (OSHA). The revised plan also did not state that the audit team will determine if the collection of samples at the filter outlets of the paint booths is required by the Missouri Department of Natural Resources to obtain air permits. The revised plan must be corrected to state that these activities will be conducted during the audit.

14. Section 4.0, Page 4-8, Interviews.

This comment was partially addressed. The revised plan stated the name and title of the individuals that will be interviewed.

Based on the titles of those to be interviewed, none of these individuals appear to have personally conducted paint stripping and maintenance activities. The individuals to be interviewed include the president, vice president, and three managers. EPA requires that the audit team also interview at least one person who has worked on the "floor" for at least 10 years and one person who has performed maintenance activities for at least 10 years.

15. Section 7.0, Pages 7-1 to 7-3, Cost Estimate/Budget.

This comment was partially addressed. The cost estimate/budget in the revised plan provides much greater detail than was presented in the May 7 plan. The proportion of time allocated to audit activities versus sampling activities is acceptable.

Table 5 was added to the revised plan to provide a detailed cost estimate for analytical expenses. The Aboveground Storage Tank Area portion of Table 5 appears to include Geoprobe operators in its total cost. Unless the Geoprobe is operated by a separate contractor or additional McLaren/Hart personnel, this appears to contradict Table 4 in which the labor cost for samplers Sandra Potter and Ben Francka has already been included. Clarify this apparent discrepancy.